

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

Clara Whitten,)	
)	C.A. No. 8:08-cv-0218-HMH-BHH
)	
Plaintiff,)	
)	
vs.)	DEFENDANT'S
)	RULE 26(f) REPORT
Fred's, Inc.,)	DISCOVERY PLAN
)	
Defendant.)	
_____)	

Defendant proposes the following pursuant to Rule 26(f), FRCP:

(A) Defendant agrees to waive the disclosures required by Rule 26(a)(1) and to pursue such information through ordinary discovery.

(B) Defendant anticipates the need for discovery on both liability and damages and believes that discovery can be completed by the date set forth in the current scheduling order.

(C) Defendant is not currently aware of any issues relating to disclosure or discovery of electronically stored information, including the forms in which it should be produced.

(D) Defendant is not currently aware of any issues relating to claims of privilege or of protection as trial-preparation material.

(E) Defendant does not believe that any change in the limitations on discovery imposed under the Federal Rules of Civil Procedure or local rules is necessary.

(F) Defendant is not aware of any other orders under Rule 26(c) or Rule 16(b) and (c) that are necessary or appropriate at this time.

s/ Shahin Vafai

Stephen T. Savitz (FID 3738)

Shahin Vafai (FID 8640)

GIGNILLIAT, SAVITZ & BETTIS, L.L.P.

900 Elmwood Ave., Suite 100

Columbia, SC 29201

Phone: (803) 799-9311

Fax: (803) 254-6951

ssavitz@gsblaw.net

svafai@gsblaw.net

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ATTORNEYS FOR DEFENDANT